

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 23-cr-20298

Honorable Judith E. Levy

vs.

Wendy Beard,

Case: 5:24-mc-51073

Assigned To : Levy, Judith E.

Assign. Date : 9/12/2024

Description: MC Michael Haar (JH)

Defendant.

**[SAMPLE] ANCILLARY PETITION<sup>1</sup>**

**SECTION I – CONTACT INFORMATION**

<b>PETITIONER INFORMATION</b>	
<b>Petitioner/Contact Name: (Last, First)</b> Haar, Michael	
<b>Business/Institution Name: (if applicable)</b>	<b>Prisoner ID: (if applicable)</b>
<b>Address: (Include Street, City, State, and Zip Code)</b> 15750 River Run Drive Spring Lake MI 49456	
<b>Phone: (optional)</b> 6169352799	<b>Email: (optional)</b> hdhaar10@gmail.com
<b>ATTORNEY INFORMATION (if applicable)</b>	
<b>Are you an attorney filing this petition on behalf of your client?</b> <input type="checkbox"/> YES <input type="checkbox"/> NO	
<b>Attorney Name: (Last, First)</b>	
<b>Attorney Title:</b>	
<b>Firm Name: (if applicable)</b>	

<sup>1</sup> **Note:** This sample is not intended to provide legal advice. There is no legal form or format required for filing an ancillary petition; this document is provided as an example for your convenience. You do not need to use this document to provide the necessary information.

<b>Attorney Address:</b> (Include Street, City, State, and Zip Code)	
<b>Attorney Phone:</b> (optional)	<b>Attorney Email:</b> (optional)

*If any of this information changes, you are responsible for notifying the Court of the new information.*

## SECTION II – ASSET LIST

*List each asset for which you are petitioning by Lightroom ID# and Title/Description<sup>2</sup> (attach additional sheets if necessary).*

[illegible]

<sup>2</sup> From Exhibit 1 of the Stipulated Preliminary Order of Forfeiture.

**SECTION III – INTEREST IN PROPERTY**

*Identify your interest in each of the assets for which you are filing an ancillary petition. If you are filing for multiple assets and the responses are not the same for each asset, please print out multiple copies of this page to submit with the petition. If you have documentation that supports your interest in the petitioned assets (e.g., consignment agreement, bill of sale, retail installment agreements, contracts, titles, or mortgages), please include copies of the documents with the submission of the petition.*

<b>INTEREST IN PROPERTY INFORMATION</b>	
<b>Lightroom ID #</b>	<b>Asset Title/Description</b>
#163	T. Wares - Oil on Canvas - Log Cabin With water in the background.

**In the space below, please explain the nature and extent of your right, title, and interest for each of the assets for which you are filing this petition. In other words, tell us why you are filing a petition for this property. This explanation should include information to identify the time and circumstances of your acquisition of any right, title, or interest in the identified asset(s).**

On October 4th 2022, I met Wendy Beard after work (Rocket Mortgage) to hand over my oil on canvas, after months of discussing her expertise and interest in one of many pieces I collected over the years. Wendy was one of my trainees and we often talked about our interest in antiques and her and her father's background in art. After many conversations, via text and teams at work, she stated this piece was valuable and she had a buyer in Paris. Considering I didn't have the resources she was going to sell it and we would discuss her cut when the price was firm. A few days after she received the artwork, I was unable to reach her and at this time was notified of her potential wrong doings. This is when I reached out to the FBI contact via the google article.

This T. Wares piece was one of many items I acquired while buying and selling antiques between 2008 and 2014 as a serious hobby. I do not have any documentation or receipt for this purchase and never had any reason to believe it was valuable or worth insuring until my conversations with Wendy. Because I trusted her, I found no reason to document the change of hands.

Our main form of communication that would prove me as the owner would be provided via TEAMS conversations at Rocket Mortgage between early 2022 and October 2022.

**In the space below, please list any documents that you are including in support of your interest in the asset(s). If none are included, please explain why.**

Attached Documents:

Personal text messages between Wendy Beard and I.

In addition to the documents I am attaching here, a large amount of our communication came through Microsoft Teams at Rocket Mortgage, mu former employer, who should be able to access the messages if you require any additional evidence to prove my ownership of this piece.

**SECTION IV – RECOVERY OF LOSS**

*Complete this section for assets you have recovered all or a portion of your losses either via an insurance claim and/or via some other source of recovery. If you have more recovery of loss information than will fit on this page, print out multiple copies of this page to attach with the petition and indicate which assets apply to each page. If you have not received any recovery for your losses, then leave this section blank.*

<b>RECOVERY OF LOSS INFORMATION</b>	
<b>Lightroom ID #</b>	<b>Asset Title/Description</b>

<b>INSURANCE CLAIM INFORMATION (if applicable)</b>	
<b>Name of Insured:</b> (Last, First)	
<b>Policy Number:</b>	<b>Claim Number:</b>
<b>Name of Insurance Company:</b>	<b>Name of Insurance Agent:</b> (Last, First)
<b>Insurance Company Address:</b> (Include Street, City, State, and Zip Code)	
<b>Phone:</b> (optional)	<b>Email:</b> (optional)
<b>Have you received compensation from the insurance company?</b> <input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Amount of Compensation:</b>

**If other sources of recovery exist (e.g., partial returns or other settlements), please list and describe the details below.**

<b>OTHER SOURCE(S) OF RECOVERY (if applicable)</b>	
<b>Source of Recovery 1:</b>	<b>Amount of Recovery:</b>
<b>Source of Recovery 2:</b>	<b>Amount of Recovery:</b>

**In the space below, please list any documents you are including in support of your claim of recovery of loss. If none are included, please explain why.**

**SECTION V – DECLARATION**

*The following declaration should be completed by the petitioner. If the petitioner is represented by an attorney, the attorney may complete the declaration as long as the petitioner completes the sworn notice of representation.*

I attest and declare under penalty of perjury that my petition is not frivolous and the information provided in support of my petition is true and correct to the best of my knowledge and belief.

Michael H  
Signature

Michael Haar  
Printed Name

9/3/24  
Date

**Sworn Notice of Representation**

*This section must be completed only by petitioners who are represented by an attorney and whose attorney has executed the declaration provided above.*

I have retained the above-named attorney who has authority to represent me in this matter. I have fully reviewed the foregoing petition and found that its contents are truthful and accurate in every respect. I declare under penalty of perjury that the foregoing information is true and correct.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

WB

Wendy

Message

Oct 4, 2022 at 12:57 PM

Hi Wendy - it's Michael Haar. I know things are crazy and i don't expect you to be focused on my art situation. (LOL) I was hoping you might be able to get me in contact with your friend to discuss selling next steps. Is it a phone number, an email, or website that I might be able to go to? Thank you again! Not sure if you can tell, but I am happy to sell any/all of these pieces 🙏

Oct 4 2022 at 6:27 PM

9:04

56



Wendy

I'm not there yet but can  
you snag my white water  
mug?

I left it next to you or  
Cody

Sure

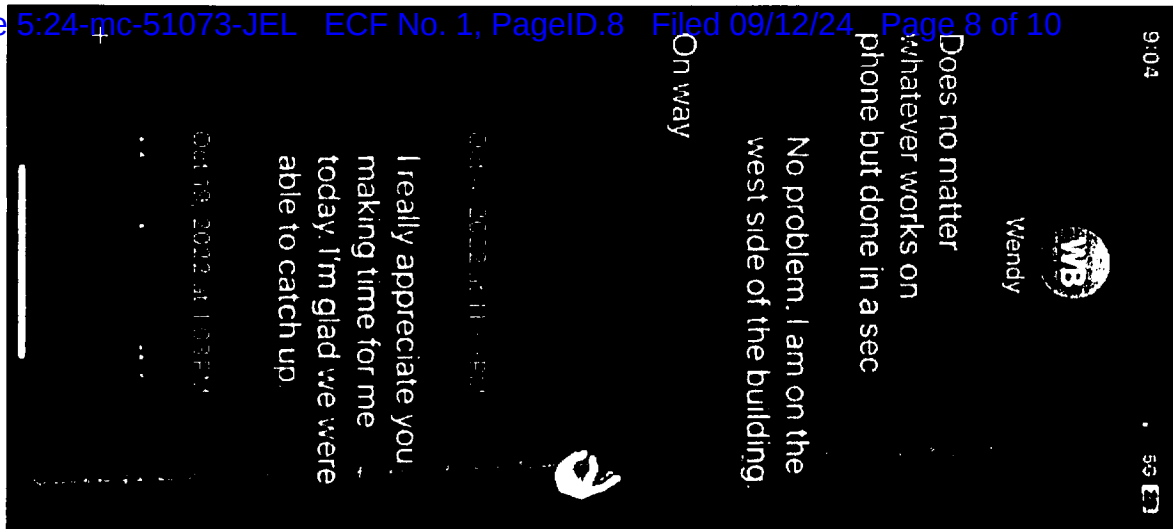
Perfect, thanks

Yes - it could use a little  
cleanup but is in solid  
shape

Let me know when there

Here

What side do you want  
me to go to?





5:04



Wendy

I really appreciate you making time for me today. I'm glad we were able to catch up

09/12/2022 01:13:14

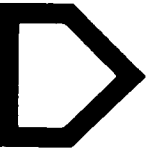
Hey - how are things going? Any updates with vroom or RA on next stages?

09/12/2022 01:13:14

Hey - I saw you haven't been online. Everything okay?

Delivered

56



MICHAEL HAAR  
15750 River Run Dr.  
Spring Lake, MI  
49456

UNITED STATES DISTRICT COURT  
CLERK OF THE COURT  
EASTERN DISTRICT OF MICHIGAN  
231 W. LAFAVETTE  
DETROIT, MICHIGAN 48226

GRAND PAID

7 SEP 20



FOREVER / USA. FOREVER / USA. FOREVER / USA

U.S.

SHAR